

# Exhibit 266



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## Nadia Ghannam

Director of Public Relations and Outreach at Palestinian Diplomatic Mission to the United States

Washington, District of Columbia, United States · [Contact info](#)

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Palestinian Diplomatic Mission to the United States



George Mason University

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Manager of Clinical Quality leads teams to be the best version of themselves by...

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## EXHIBIT

0002

Nadia Ghannam

07/23/2021

## Experience

**Director of Public Relations and Outreach**

Palestinian Diplomatic Mission to the United States

Jun 2008 – Present · 13 yrs 2 mos

**Television Host**

ART / Arab Radio &amp; Television

Jun 2004 – Apr 2007 · 2 yrs 11 mos

**Assistant Vice President and Financial Center Manager**

BB&amp;T

Oct 2003 – Jan 2007 · 3 yrs 4 mos

Alexandria, Virginia

**Senior Branch Manager**

First Virginia Bank

May 1999 – Oct 2003 · 4 yrs 5 mos

## Education

**George Mason University**

Bachelor of Arts - BA, International Studies and History

**The Johns Hopkins University**

Master of Arts - MA, Public and Media Relations and Political Communications

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**Noor Kirdar** · 3rd+

Consultant

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**Neemat El Rashidi** · 3rd+

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## People you may know

**Nicole Arndt**Career & Life Design Coach | Program  
Manager for Fun, Wellness, Learning &...

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strategist · educator · futurist

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**Alfredo Spagna**Faculty of the Department of Psychology,  
Columbia University

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**Marie Erickson**English Teacher at Columbia Heights  
Educational Campus

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Incoming Arts and Cultural Management  
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# Exhibit 267



**State of Palestine**   
@Palestine\_UN

**EXHIBIT**  
0006  
Nadia Ghannam  
07/23/2021

The official [#Palestinian](#) position rejects this 'plan' & considers the so-called plan a declaration of hostility against the inalienable rights of the [#Palestinian](#) ppl. This 'plan' poses a serious threat to the the foundations of int. law [@Palestine\\_UN](#)

**PLO Department of Public Diplomacy & Policy** [@PalestineP...](#) · Feb 2, 2020

Read| The official [#Palestinian](#) position from the Trump administration's so-called plan. "This 'plan' contains all the elements of perpetual conflict, oppression & injustice."

[bit.ly/PLOposition](https://bit.ly/PLOposition)

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1:59 PM · Feb 4, 2020 · Twitter Web App

30 Retweets 2 Quote Tweets 49 Likes



**Nathaniel Mulcahy** [@aVoice4MA6](#) · Feb 4, 2020

Replying to [@Palestine\\_UN](#)

The State of Palestine has my full support and recognition



1



4



**Robert Mandell** [@mandellr](#) · Feb 4, 2020

[@aVoice4MA6](#), can you please tell us the borders of the land you recognize? And the basis on which to recognize these borders? Thank you.



**Robert Mandell** [@mandellr](#) · Feb 4, 2020





## Position Paper: The Trump Administration's so-called Plan

For Immediate Release

2 February 2020

The State of Palestine rejects this 'plan' and considers the so-called plan a declaration of hostility against the inalienable rights of the Palestinian people. This 'plan' poses a serious threat to the rules-based international order and the foundations of international law. It is a conceptually flawed, absolutist, and irresponsible agreement of surrender the US administration wants to coerce Palestine into signing, thus reverting to a world where conquerors take the spoils as victims are stripped of life and property.

The so-called plan discards the requirements of peace by endorsing annexation of large parts of the Occupied Palestinian Territory as well as ethnic cleansing byway of transfer of nearly 300,000 Palestinian-Israeli citizens, which are both crimes strictly prohibited under international law. It does not regard the Palestinian Territory, including East Jerusalem, as occupied and thus discards the international consensus on the issue and instead endorses the absolutist rightwing Israeli perspective. The so-called plan also maintains and seeks endorsement for the illegal annexation of occupied Jerusalem, in defiance of the UN Charter and relevant UN Security Council and General Assembly resolutions. It also endorses the theft of resources byway of annexation and hegemonic Israeli military control.

The US 'plan' presents a disconnected and unviable archipelago of Palestinian communities stripped of any sovereignty or viability, engulfed in Israel's belly and denied of any control over borders, airspace, territorial waters, security, or natural resources. These are conditions that no country can accept.

While granting Israel immediate rewards of annexation, the 'plan' also conditions economic and political development in Palestine on Israeli and US approval, hence removing any pretense of sovereignty. Additionally, the plan rejects the rights of Palestine refugees and requires Palestine to abandon all efforts to seek justice and redress through international tribunals.

The State of Palestine does not consider this 'plan' a basis for any credible or constructive dialogue. Palestine maintains that this 'plan' contains all the elements of perpetual conflict, oppression, and injustice. It has no legal or political validity and the Palestinian leadership will not engage in any discussion based on its content.

Further, the State of Palestine reaffirms that the rights of the Palestinian people to self-determination, freedom, justice, and sovereignty are fundamental and non-negotiable. The Palestinian leadership will fulfill its responsibility to defend the inalienable rights of the Palestinian people by pursuing all available legal and diplomatic avenues to protect Palestinian national rights and confront this announced plan of aggression. The State of Palestine will continue to act in line with international law and cooperate with states that share our values to defend the standing and relevance of international law and the rules-based international order.

The Palestinian leadership reaffirms its readiness to engage in a constructive and meaningful political effort on the basis of international law, relevant United Nations resolutions, and the Arab Peace Initiative. This vision was presented by President Mahmoud Abbas to the UN Security Council in February 2018 and the Palestinian leadership is prepared to work with the international community to achieve a reality of peace, dignity, and justice on this solid foundation.

The State of Palestine views accepting this dangerous proposal as tantamount to endorsement of a new and lawless era in international politics where aggression and annexation are normalized. Endorsing this plan and its false claims would unravel the international rules-based order and the system of laws and regulations that have informed international relations for over seventy years. It surrenders future generations to chaos, lawlessness and the rule of the jungle.

Finally, Palestine reminds all States of their responsibility to strictly refrain from aiding or abetting, whether directly or indirectly, violations of international law, including annexation. States that accept or normalize the US-Israeli agenda of annexation and denial of Palestinian national rights would be complicit in undermining the standing of the international order. We call on responsible actors to take serious and effective measures to protect the requirements of peace and ensure accountability by adopting the logical and responsible course of action of exacting a cost for the continuation of this illegal occupation and annexation.



# Exhibit 268

Thread

State of Palestine Retweeted

Palestine PLO-NAD  
@nadplo

Today, occupied #Palestine marks #LandDay as we and the world face the threat of #COVID19. With resilience and strength, we will defeat it despite the continued Israeli violations against the land and people of Palestine.



10:46 AM · Mar 30, 2020 · Twitter Web App

72 Retweets · 1 Quote Tweet · 94 Likes



Palestine PLO-NAD @nadplo · Mar 30, 2020

Replying to @nadplo

Today we highlight a handful of Israeli violations against the Palestinian people between 5 March, when #Palestine declared a state of emergency over the outbreak of #COVID19, until the morning of 30 March.

#LandDayPalestine

# LANDDAY

 NADPLO

# ISRAELI VIOLATIONS: 5 - 30 MARCH 2020



2

Killed



48

Wounded



217

Detained



184  
Raids



9

Homes  
Demolished



59

Settlers  
Violence

# Exhibit 269

Tweet

State of Palestine Retweeted

PLO Department of Public Diplomacy & Policy  
@PalestinePDP

EXHIBIT

0008

Nadia Ghannam  
07/23/2021

**@DrHananAshrawi:** "While the world works on saving lives, US and Israel working on killing prospects of peace through annexation"

Access here [bit.ly/2wD7kMw](https://bit.ly/2wD7kMw)



منظمة التحرير الفلسطينية  
Palestine Liberation Organization

**Dr. Hanan Ashrawi: While the world works on saving lives, US and Israel working on killing prospects of peace through annexation.**

12 April 2020

Israel is cynically exploiting the international community's focus on protecting humanity and the world economy from the devastating consequences of the COVID-19 pandemic to implement its expansionist and imperialist, colonial agenda. Israeli politicians are busy negotiating a conflict agreement centered on permanent colonization and annexation at the expense of Palestinian lives, land, and rights.

While the world is preoccupied with combating COVID-19, the joint Israeli-US committee set up to implement the US administration's disastrous so-called plan has found the time and energy to work on annexation and prioritize it over saving lives. The clear support and sponsorship of the US administration of these dangerous plans is further proof of the disruptive and irresponsible role of the Trump administration at all levels.

Israeli annexation is not a possibility the world should be worried about. It is a reality unfolding on the ground to the grave detriment of future generations in the region and at the expense of the standing and relevance of multilateral efforts and international law. Israel is taking practical steps to permanently and irreversibly erode the realities of the Palestinian people's core human rights to freedom and independence, thus ensuring permanent conflict in the region.

Israel has scaled up land grabs, settlement and Wall construction, rightly ruled and other illegal measures and crimes to solidify the irreversible aspects of colonial expansion. This agenda is now the common ground on which unity government discussions are based, dissolving any pretension that non-Israeli political actors have differences on the policies of ensuring permanent colonization, enacting annexation, and enforcing apartheid-like policies.

This dangerous agenda is neither new nor surprising. It is what the Palestinian leadership has warned from for years. Regrettably, the international community has abdicated its responsibilities to hold Israel accountable for its pervasive illegal actions and shameful impunity. This inaction has emboldened and empowered the Israeli political establishment to abandon all pretense of commitment to the internationally agreed-on solution of two states on the basis of international law and relevant United Nations resolutions. The current US administration's ideological and practical partnership with Israel on the issues of annexation and permanent occupation has made the situation completely unbearable.

Despite its focus on combating the COVID-19 pandemic, the international community is well aware of what is transpiring on the ground, including fierce obstruction of Palestinian efforts to combat the virus effectively. This was evident in the recent European Union statement announcing increased assistance to Palestine to help fight the virus. However, rhetorical diagnosis of the threat to peace and international obligations will not be enough to avert the complete breakdown of the world agenda for peace. Serious and decent international action is required to stop Israeli actions and plans. Time has run out on complacency and platitudes.

9:00 AM · Apr 12, 2020 · Twitter Web App

15 Retweets · 2 Quote Tweets · 14 Likes





## منظمة التحرير الفلسطينية Palestine Liberation Organization

### **Dr. Hanan Ashrawi: While the world works on saving lives, US and Israel working on killing prospects of peace through annexation**

12 April, 2020

Israel is cynically exploiting the international community's focus on protecting humanity and the world economy from the devastating consequences of the COVID-19 pandemic to implement its extraterritorial and expansionist colonial agenda. Israeli politicians are busy negotiating a coalition agreement centered on permanent colonization and annexation at the expense of Palestinian lives, land, and rights.

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Israeli annexation is not a possibility the world should be worried about. It is a reality unfolding on the ground to the grave detriment of future generations in the region and at the expense of the standing and relevance of multilateral efforts and international law. Israel is taking practical steps to permanently and irreversibly undercut the realization of the Palestinian people's inalienable rights to freedom and independence, thus ensuring permanent conflict in the region.

Israel has scaled up land grab, settlement and Wall construction, nightly raids and other illegal measures and crimes to satisfy the insatiable appetite of colonial expansion. This agenda is now the common ground on which unity government discussions are based, dissolving any pretension that main Israeli political actors have differences on the policies of ensuring permanent colonization, enacting annexation, and enforcing apartheid-like policies.

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**Dr. Ashrawi: While the world works on saving lives, US and Israel working on killing prospects of peace through annexation**

(12 April, 2020)

Israel is cynically exploiting the international community's focus on protecting humanity and the world economy from the devastating consequences of the COVID-19 pandemic to implement its extraterritorial and expansionist colonial agenda. Israeli politicians are busy negotiating a coalition agreement centered on permanent colonization and annexation at the expense of Palestinian lives, land, and rights.

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Serious and deterrent international action is required to stop Israeli actions and plans. Time has run out on complacency and platitudes.

# Exhibit 270

State of Palestine Retweeted

IMEU  
@theIMEU

Ever since Trump took office in 2016, Israel has built more illegal settlements on Palestinian land and displaced more families than in previous years. Now, Israel plans to begin annexing entire swathes of land in the West Bank. [aljazeera.com/news/2020/04/n...](https://www.aljazeera.com/news/2020/04/n...)



6:30 PM · Apr 28, 2020 · Buffer

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# Exhibit 271



State of Palestine  
@Palestine\_UN



.@TheElders call for new Middle East peace plan to counter Israeli annexation threat  
[theelders.org/news/elders-ca...](https://theelders.org/news/elders-ca...) @un #palestine  
#annexation #theelders



The Elders call for new Middle East peace plan to counter Israeli annexation thr...  
The Elders today called for new engagement from the international community to deliver a just outcome to the Israeli-Palestinian conflict and uphold ...  
[theelders.org](https://theelders.org)

3:03 PM · May 11, 2020 · Twitter Web Client

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## The Elders call for new Middle East peace plan to counter Israeli annexation threat

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Photo: Dennis Jarvis / Flickr

11 May 2020

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The Elders today called for new engagement from the international community to deliver a just



outcome to the **Israeli-Palestinian conflict** and uphold international law in the face of plans by the new Israeli government to illegally annex swathes of the West Bank.

A new initiative in the spirit of the Madrid Peace Conference of 1991 is needed to bring both Israelis and Palestinians, as well as regional and international powers, into meaningful dialogue on the way forward. Existing multilateral mechanisms like the Quartet should be revitalised and potentially expanded to give a greater role to other powers in the region.

Conversely, The Elders warned that the annexation plans represent a unilateral repudiation of the two-state solution, and are opposed by most countries in the region and internationally. Annexation risks plunging the region into deeper turmoil, further fomenting bitterness and alienation among Palestinians, antagonising Israel's neighbours and eroding the democratic and constitutional framework of the Jewish state.

**Mary Robinson**, Chair of The Elders and former UN High Commissioner for Human Rights, said:

*"The conflict between Israel and the Palestinians can only ever be solved by finding a solution that guarantees peace, security, rights and dignity to both peoples. Unilaterally seizing territory and ignoring international law achieves precisely the opposite. Such a move betrays both the interests of Israeli citizens and the ideals of the State's founders."*

US support alone cannot deliver lasting success on the ground when the proposals announced by President Donald Trump in January have been comprehensively rejected by all strands of Palestinian leadership and Israel's neighbours.

**Jimmy Carter**, Elder Emeritus and former President of the United States, said:

*"If the joint mapping of Palestinian lands to be seized by the Israeli government continues, the standing of the United States in the international community will be further damaged. The West Bank belongs to Palestine, and any changes should be mutually agreed upon."*

**Ban Ki-moon**, Deputy Chair of The Elders and former Secretary-General of the United Nations, added:

*"The principles of international law are the bedrock of our global order. They provide a framework for defending rights and exercising power that is crucial to all global challenges. Israeli annexation of parts of the West Bank would not only be an act of aggressive folly, it would have a destructive influence on global rights and norms. I call on the whole world to speak out against this damaging agenda."*

The Elders welcomed the efforts of brave voices in Israeli civil society and Jewish diaspora groups who have opposed annexation, and encouraged them to stand firm in their support for peace, democracy and a two-state solution.

They further warned that a situation where Jewish communities in the West Bank live under Israeli civilian law, while neighbouring Palestinians live under Israeli military law, would inevitably prompt parallels with historical repressive and discriminatory regimes, including apartheid South Africa.

**Lakhdar Brahimi**, former Algerian Foreign Minister and UN diplomat, said:

*"The Palestinian people deserve the world's solidarity and support. Their independence and agency are denied, their polity divided and their rights ignored by the occupying power, even when Palestinian doctors and nurses work tirelessly in Israeli hospitals to fight the Covid-19 pandemic. The Palestinians have an inalienable right to their land and to their state. And they have the right to struggle for those rights. The world has overlooked its responsibility to the people of Palestine for too many decades. Silence now would be a bitter betrayal, and is certain to have dire consequences for all concerned."*

ENDS

---

For media inquiries, please contact Luke Upchurch, Director of Communications at The Elders (+44 7741 742 064) or email: [media@theElders.org](mailto:media@theElders.org)



## FEATURED ELDERS



### Ban Ki-moon

Former UN Secretary-General and former South Korean Foreign Minister; championed the world's vulnerable by putting Sustainable Development, climate change, and gender equality at the top of the UN agenda.



### Lakhdar Brahimi

Former Algerian freedom fighter, Foreign Minister, conflict mediator and UN diplomat; an expert in peacekeeping and post-conflict reconstruction.



### Jimmy Carter

Former President of the United States, Nobel Peace Laureate and veteran peace negotiator; dedicated to advancing peace, democracy and health worldwide.



### Mary Robinson

First woman President of Ireland and former UN High Commissioner for Human Rights; Chair of The Elders; a passionate advocate for gender equality, women's participation in peace-building, human dignity and climate justice.

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## RELATED CONTENT



## **The Elders condemn US recognition of Jerusalem as Israeli capital as grave risk to peace**

The Elders condemn US President Donald Trump's unilateral decision to recognise Jerusalem as the capital of Israel as a grave threat to peace across the Middle East.

## **Lakhdar Brahimi on the political legacy of the Balfour Declaration**

On 26 October, Lakhdar Brahimi joined a panel discussion at Chatham House, marking 100 years since the Balfour Declaration. Read his opening remarks in which he reflects on Britain's responsibility&nbsp;for political developments in the region since 1917



## **Together, we can shape a better future for us all**

At a time of populism and isolationism, when polarised politics and self-interest have the upper hand, The Elders offer an alternative approach.





### **Ban Ki-moon: The world should back a new approach to the Israeli-Palestinian conflict**

30 Jun 2021

Ban Ki-moon calls for a new approach to the Israeli-Palestinian conflict, and recognises the importance of the international community in ending the enduring violence and oppression in the region. First published in Financial Times.



### **The Elders call on UN Security Council to address root causes of Israeli-Palestinian violence**

16 May 2021

The Elders today called on the UN Security Council to act urgently to prevent further military attacks in Israel and Palestine and address the root causes of the conflict.



## **The Elders deeply regret the postponement of Palestinian elections**

30 Apr 2021

As Palestinian leader Mahmoud Abbas announces the postponement of parliamentary elections, Lakhdar Brahimi and Mary Robinson express concern for reconciliation and democratic rights.



## ICC and Israel-Palestine: an investigation is a step towards justice

15 Mar 2021

Mary Robinson underscores the importance of accountability and calls on the international community to support the International Criminal Court's decision to investigate the situation in the occupied Palestinian territories.

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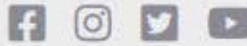
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Mary Robinson on the need for ethical leadership to tackle our shared challenges. Listen to her discussion with Graça Machel on #NelsonMandela's legacy and the global #StateOfHope, on a new episode of the @Find\_Humanity #podcast. Listen and Pass it On:  
<https://t.co/TA1XPL9Ac6>  
<https://t.co/8ZE6emeHIF>

7 20



The Elders TheElders

Migration, refugees and border policies must always be rooted in human rights and protection for the most vulnerable, as must the global approach to the climate crisis. <https://t.co/0cfvcnpO5y>

12 22



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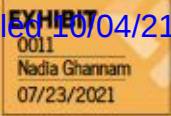
# Exhibit 272

Thread

↻ State of Palestine Retweeted



**PLO Department of Public Diplomacy & Policy**  
@PalestinePDP



...

18 Senate Democrats, led by Senators  
[@ChrisVanHollen](#), [@ChrisMurphyCT](#), and [@timkaine](#),  
expressed yesterday grave concern regarding unilateral  
annexation of Palestinian territory. | [bit.ly/3gfbZ4s](https://bit.ly/3gfbZ4s)



9:49 AM · May 22, 2020 · Twitter Web App

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PLO Department of Public Diplomacy & Policy @P... · May 22, 2020

...



## IMPORTANT NEWS



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ARCHIVE



22/May/2020 12:53 PM

## US Senators urge Netanyahu and Gantz not to go ahead with annexation plan

WASHINGTON, Friday, May 22, 2020 (Wafa) – Eighteen Senate Democrats, led by Senators Chris Van Hollen, Chris Murphy, and Tim Kaine, expressed yesterday grave concern regarding unilateral annexation of Palestinian territory starting potentially as early as July.

In a letter to Israeli Prime Minister Benjamin Netanyahu and “Defense” Minister Benny Gantz, the senators warned that such a move would mark a dramatic reversal of decades of shared understandings between the United States, Israel, the Palestinians and the international community, and would impact Israel’s future, placing its security and democracy at risk.

“A deep commitment to Israel’s security and a shared set of democratic values are foundational elements of the close relationship between our countries. We are therefore concerned that unilateral annexation puts both Israel’s security and democracy at risk. Annexation would betray our shared democratic values by denying Palestinians’ right to self-determination in a viable, sovereign, independent and contiguous state. It could bring an end to Palestinian security cooperation with Israel, directly threatening the security of the Israeli people, and endanger Israel’s crucial peace agreement with Jordan,” the senators wrote.



They concluded: "As friends and supporters of Israel, we caution you against taking unilateral steps that would fray our unique bonds, imperil Israel's future and place out of reach the prospect of a lasting peace. If you move forward with unilateral annexation, we would not support that action."

"This is consistent with long-standing American policy opposing unilateral actions by either party to the conflict. Pursuit of a viable, negotiated two state solution is essential to ensuring our shared democratic values and lasting bipartisan support for Israel in Congress."

Joining Van Hollen, Murphy, and Kaine were Senators Brian Schatz (D-Hawaii), Patrick Leahy (D-Vt.), Dick Durbin (D-Ill.), Sherrod Brown (D-Ohio), Tammy Baldwin (D-Wis.), Tom Udall (D-N.M.), Jeff Merkley (D-Ore.), Ed Markey (D-Mass.), Martin Heinrich (D-N.M.), Sheldon Whitehouse (D-R.I.), Jeanne Shaheen (D-N.H.), Tammy Duckworth (D-Ill.), Tom Carper (D-De.), Elizabeth Warren (D-Mass.), and Bernie Sanders (I-Vt.).

M.N

## Related News



Palestinians in northern West Bank town received demolition orders



Woman, 75, dies of coronavirus in West Bank, bringing overall total to 46 – Health Ministry



Israeli army detains 10 Palestinians in Jerusalem, West Bank

– PPS



Ministry of Health: 293 new coronavirus cases in Palestine, including 108 in Jerusalem

## Latest News

### ➔ Israeli settlers prevent Palestinian shepherd ...

21/July/2021 05:18 PM

### ➔ Over 150 Palestinian organizations, village ...

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### ➔ Fatah calls on European governments to preve ...

21/July/2021 02:26 PM

### ➔ Palestine records 115 new coronavirus cases, ...

21/July/2021 01:47 PM

### ➔ Toddler dies after drowning in water well we ...

21/July/2021 01:45 PM

### ➔ President Abbas congratulates King of Belgiu ...

21/July/2021 12:59 PM

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Israeli military infiltrates Gaza border, raze farmland

🕒 20/July/2021 01:03 PM



British Consulate General concerned over recent Israeli

🕒 19/July/2021 08:18 PM



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# Exhibit 273





Tweet

State of Palestine  
@Palestine\_UN

EXHIBIT  
0012  
Nadia Ghannam  
07/23/2021

#WatchNow: @PalestinePDP The reality of #occupation and #annexation in #Jerusalem. @Palestine\_UN #Palestine

🇵🇸 PLO Department of Public Diplomacy & Policy @PalestinePDP · Jul 28, 2020  
WATCH: The reality of occupation and #annexation in #Jerusalem summed up. Ethnic cleansing, land theft, oppression, persecution and other #IsraeliCrimes continue in the absence of #accountability.



1:19 PM · Jul 29, 2020 · Twitter Web App

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# Exhibit 274

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Nadia Ghannam  
07/23/2021

Israel uses [#AdministrativeDetention](#) to detain hundreds of [#Palestinians](#) without charge or trial every year. Maher Al-Akhras is protesting this cruel measure. He's been on hunger strike since Israel detained him on July 22. His life is now in grave danger. [#StopAD](#)  
[#SaveMaher](#)



1:09 PM · Oct 6, 2020 · Twitter Web App

127 Retweets 14 Quote Tweets 113 Likes



PLO Department of Public Diplomacy &amp; Policy @Pal... · Oct 6, 2020

Replying to [@PalestinePDP](#)

Background: This policy has raised serious international concern in the past, including from the UN Special Rapporteur on the situation in the Occupied Palestinian Territory Mr. Michael Lynk. [ohchr.org/EN/NewsEvents/](https://ohchr.org/EN/NewsEvents/)

# Exhibit 275



State of Palestine

@Palestine\_UN

25 November: Letter on the Plight of #Mohammed el Halabi "My son was #tortured for 2 months as the Israeli interrogators tried to extract a confession from him and as a result, he has lost 40% of his ability to hear..." Read letter here: [shar.es/aoWa0s](https://shar.es/aoWa0s) #Palestine #Gaza

2:27 PM · Nov 28, 2020 · Twitter Web App

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## Permanent Observer Mission of The State of Palestine to the United Nations New York

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## 25 November 2020 – Letter on the Plight of Mohammed el Halabi

25 NOVEMBER 2020 BY [PALESTINE AT THE UN](#)

Excellency,

I write to you to convey the somber letter and urgent appeal of a Palestinian father in the Gaza Strip, Dr. Khalil el Halabi, regarding the plight of his son, Mohammed el Halabi, who has been held captive by Israel, the occupying Power, since June 2018, imprisoned without any evidence of the charges brought against him and enduring forced interrogations and torture aimed at pressuring a confession from him for a crime he did not commit. Mohammed has long engaged in humanitarian work in support of his people was the recipient of a UN Humanitarian Hero award in 2014 in recognition, *inter alia*, for his tireless work with Palestinian children in Gaza who have been afflicted with cancer, and is recognized widely for his humanitarian efforts.

I share this letter with you at the request of his father, urgently appealing for any advocacy and action that can help to address Mohammed's plight and facilitate his release from Israeli prison. I also take this opportunity to reiterate the Palestinian leadership's abiding call for the release of all Palestinian children, women and men that are being unlawfully detained and imprisoned by Israel, the occupying Power, including administrative detainees, and for urgent attention in particular to the most vulnerable of the prisoners, including children, the sick and elderly and especially in this time of global pandemic, and urge the international community's mobilization in this regard.

I would be grateful if you could bring my letter and the annexed letter of Dr. el Halabi to the attention of the Members of the Security Council for their urgent consideration.

Please accept, Excellency, the assurances of my highest consideration

Dr. Riyad Mansour

Minister, Permanent Observer Mission of the

State of Palestine to the United Nations

To: Members of the UN General Assembly

Members of the UN Security Council,

By way of Dr. Riyad Mansour

Permanent representative of the State of Palestine to the UN



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I am writing to you in regards to the case of my son, the engineer Mohammad Khalil Al Halabi who has been unjustly held in Israeli jails since June 15th 2018. He has been presented at 152 sessions of Israeli courts in one of the longest courts known without any proof being presented publicly against him. Even his lawyer is not allowed to see what they claim is the reason for his arrest. What the Israelis say publicly that he diverted money from the organization he was working for World Vision has been refuted by reputable governmental agencies of the Australian government who was the main donor and by the world's leading audit companies.

My son was tortured for two months as the Israeli interrogators tried to extract a confession from him and as a result, he has lost 40% of his ability to hear. The torture included putting a dirty bag over his head and forcing him to sit for a long time while preventing him from food and sleep. He was held in an isolated room 25cmx25cm with his hands handcuffed behind his back. He was threatened with rape and he was subject to loud music. All to force him to confess to a crime he has never committed.

World Vision and the Australian government conducted intensive investigations of the alleged crime and found no proof of any irregularity in his work and both have condemned his continued arrest as has most international organizations including the OCHA which produced a very strong statement calling for his immediate release.

His lawyer has told the media that the Israelis know he is innocent but they are not willing to climb down the tree that they had ascended to so as not to be embarrassed and the result is this prolonged never-ending court delays. My son could have been released a long time if he plead guilty but he refuses to plead guilty to a crime he never committed.

Mohammad Al Halabi has been honored for his work by President Arafat and has received your own UN's Humanitarian Hero Award in 2014 for his tireless work with cancer children in Gaza and his relentless effort to try and ease the humanitarian disaster to the people of Gaza.

I hope that this letter can be distributed to all member states and that my son's name is publicly mentioned by all including His Excellency the Secretary General, perhaps that could force the Israeli government to agree to release him and end this long and unjust detention of an innocent man.

Finally, my message to the Israeli government: this is not the way to make a just peace. A peace that will allow our children to live in peace. We are seekers of a just peace and a just solution to our cause which requires that the issue of prisoners is addressed.

Dr. Khalil el Halabi

Gaza

November 25th 2020

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## UN Security Council War Crimes West Bank

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16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

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  - Statements
  - Identical Letters
  - Press Releases
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# Exhibit 276



State of Palestine  
@Palestine\_UN

Statement by @pmofa: Under intl. law, including intl. humanitarian & human rights law, Israel bears legal obligations towards the welfare of the #Palestinian population under its illegal #occupation, including #COVIDVaccination. Read full statement below: @UN

Palestine PLO-NAD @nadplo - Jan 11

NEW Media Brief: #COVID19 Vaccines and Israel's Obligations as an Occupying Power [shar.es/aohEks](https://shar.es/aohEks) #Palestine



9:16 AM - Jan 11, 2021 - Twitter for iPhone

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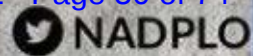


Arsen Ostrovsky @Ostrov\_A · Jan 11

Replying to @Palestine\_UN @pmofa and @UN



# NEW MEDIA BRIEF





STATE OF PALESTINE  
PALESTINE LIBERATION ORGANIZATION  
**NEGOTIATIONS AFFAIRS DEPARTMENT**

# COVID-19 Vaccines and Israel's Obligations as an Occupying Power

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Media Briefs - January 11, 2021

## Introduction

The world has been facing one of its harshest social, economic, and health crises since the outbreak of the COVID-19 pandemic. Nations worldwide are still forced to take strict social distancing measures, total or partial lockdowns, and difficult decisions to protect their citizens from a fast-spreading and infecting disease that continues to take many lives. All the while, scientists were busy with lengthy research procedures to find a vaccine. To date, there are over 60 vaccines in clinical trials. However, countries have approved a few vaccines and started the process of immunization of targeted groups.

As for Israel, the process of vaccination has started on 7 January 2021, data collected by the University of Oxford indicate that around 1.7 million Israelis are vaccinated, which means that Israel has vaccinated more than 10 percent of its population. Thus, as of 7 January 2021, Israel is leading worldwide in administered vaccines per 100 people, with the United Arab Emirates and Bahrain following, respectively. At this rate, it is expected that the majority of the population would be vaccinated around the end of March. All the while, silence once again prevails on Israel's responsibility as an occupying Power towards the occupied Palestinian territory during this pandemic. While illegal colonial-settlers who reside on stolen Palestinian land have access to vaccines, Palestinians in the West Bank, excluding occupied and annexed East Jerusalem, and the Gaza strip, stand defenseless as an occupied population in their ability to access any immunization for the virus. The same applies to Palestinians in occupied East Jerusalem whom Israel revoked their identity resident cards. This has led some to call this the worst form of discrimination and even "medical apartheid".

In the occupied State of Palestine, the government is trying through its channels to secure vaccines. This means that it might take months until Palestine's Ministry of Health starts immunization procedures. It also means that Palestine might not be able to provide vaccines for the population as a whole and focus its immunization strategy, based on the number of vaccines received, on what it can provide for high-risk categories, such as health works, elderly, and people at high risk due to existing health conditions. As of today, the Health Ministry announced that they would be receiving



the Pfizer vaccine through COVAX. The Pfizer vaccine requires storage in very low temperatures, as low as minus 70 degrees Celsius and below, which requires special storage equipment with minimal availability in Palestine, posing another challenge.

As of 9 January 2021, there were over 165,000 active cases in the State of Palestine, including in East Jerusalem. So far, 1735 Palestinians lost their lives.

Despite a prolonged military occupation, and as a result, a compromised health care system, a financial crisis, and a volatile political situation, the State of Palestine has been performing to its maximum capabilities to guarantee the right to health for its population, including with its recent efforts to purchase authorized vaccines for COVID-19. Yet, Israel has been adamant in refraining from fulfilling its responsibility as an occupying Power under international humanitarian law and human rights law. Israel has also hampered the work of the State of Palestine to manage the health crisis.

## **Israel's Responsibility as an Occupying Power in Providing Vaccines for the Protected Population**

As an occupying Power, Israel has responsibilities towards the occupied Palestinian territory and the protected population under international humanitarian law, international human rights law, and Israel's signed agreements with the Palestine Liberation Organization (the Oslo Interim Accords).

### **A. Israel's Responsibility According to International Humanitarian Law**

Israel's responsibility can be first derived from the **Hague Regulations** of 1907 Article 43, which iterates the general obligations of the occupying Power:

*"The authority of the legitimate power having in fact passed into the hands of the occupant, the latter shall take all the measures in his power to restore, and ensure, as far as possible, public order and safety, while respecting, unless absolutely prevented, the laws in force in the country."*

The **Fourth Geneva Convention** supplements this Article. Article 55 of the Convention states that:

*"To the fullest extent of the means available to it, the Occupying Power has the duty of ensuring the food and medical supplies of the population; it should, in particular, bring in the necessary foodstuffs, medical stores and other articles if the resources of the occupied territory are inadequate."*

Commentary on the Fourth Geneva Convention<sup>[7]</sup> reminds the occupying Power that medical supplies mentioned in the article include the provision of:

*"necessary medical supplies, such as medicaments, vaccines and sera, when the resources of the occupied territory are inadequate."*

Article 56 further specifies the responsibilities of the occupying Power in regards to the right to health of the protected population, and particularly pointing to the obligation of the occupying Power in cooperating with national and local authorities in cases of the spread of contagious diseases; the Article explains that the occupying Power:

*"has the duty of ensuring and maintaining, with the co-operation of national and local authorities, the medical and hospital establishments and services, public health and hygiene in the occupied territory, with particular reference to the adoption and application of the prophylactic and preventative measures necessary to combat the spread of contagious diseases and epidemics..."*

Furthermore, the Fourth Geneva Convention in Article 59 places an obligation on the occupying Power not to impede relief schemes directed to the occupied territory. It establishes a further obligation on the occupying Power to facilitate their arrival to the occupied territory.<sup>[2]</sup>

## **B. Israel's Responsibility According to International Human Rights Law**

Also, it has been established that Israel, as an occupying Power, has human rights obligations towards the population and territory it occupies. The International Court of Justice affirmed this in its 2004 Advisory Opinion on the wall.<sup>[3]</sup>

Under international human rights law, the right to health is mentioned in the **Universal Declaration of Human Rights**, Article 25.1 states:

*"Everyone has the right to a standard of living adequate for the health of himself and of his family, including food, clothing, housing and medical care and necessary social services."*

However, the **International Convention on Economic Social and Cultural Rights (ICESCR)** is regarded as having a more comprehensive article, under international human rights, on the right to health. Article 12 of ICESCR states:

*"1. The States Parties to the present Covenant recognize the right of everyone to the enjoyment of the highest attainable standard of physical and mental health.*

*2. The steps to be taken by the States Parties to the present Covenant to achieve the full realization of this right shall include those necessary for:*

*(a) The provision for the reduction of the stillbirth-rate and of infant mortality and for the healthy development of the child;*

*(b) The improvement of all aspects of environmental and industrial hygiene;*

*(c) The prevention, treatment and control of epidemic, endemic, occupational and other diseases;*

*(d) The creation of conditions which would assure to all medical service and medical attention in the event of sickness."*

General Comment 14, which elaborates what this article entails, explains that states have core obligations in fulfilling their responsibility regarding the right to health. As described in the General Comment<sup>[4]</sup>:

*"to provide immunization against the major infectious diseases occurring in the community" and "to take measures to prevent, treat and control epidemic and endemic diseases..."*

The General Comment further highlights that states have an obligation to guarantee the right to health for all, without discrimination, including to provide access for the right to health for detainees and prisoners.<sup>[5]</sup>

As for refugees, the General Comment explains that the obligation to guarantee the right to health, and in this case to ensure that Palestine refugees have access to vaccines, is a collective responsibility of the international community.<sup>[6]</sup>

### **C. Israel's Obligations According to Oslo Interim Accords**

Cooperation between Israel and the PLO in combating epidemics and contagious diseases is included in the 1995 Interim Agreement, Annex II, Article 17.6:

*"Israel and the Palestinian side shall exchange information regarding epidemics and contagious diseases, shall cooperate in combating them and shall develop methods for exchange of medical files and documents."*

## **Palestine's Concerns During COVID-19 Pandemic**



## 1. Prisoners

Currently, there are 4,400 Palestinian prisoners in occupation prisons. They are kept in cells characterized by overcrowdedness, lack of basic necessities, poor hygiene, humidity, and a severe lack of fresh air. Such conditions make it impossible for prisoners to practice health and safety protocols instructed by the WHO, mainly in social distancing, washing hands, and wearing protective gear such as masks and even access to proper equipment to clean and disinfect their cells. Prisoners are left with only one way, protesting to demand their fundamental rights and necessities during the pandemic. This has left Palestinian prisoners extremely vulnerable. Since the outbreak of the pandemic, 189 prisoners have tested positive. Prisoners infected with the virus have reported deplorable treatment, isolation, one pain killer, and one lemon.

In the meantime, Israel, the occupying Power, must provide safety measures to guarantee Palestinian prisoners' health during this pandemic and ensure their vaccination. This should be done with the request of international presence to warrant that this process is done through trained medical staff and in a safe environment and under international eyes.

It is essential to highlight that Palestinian prisoners must not be discriminated against and must access all elements of the right to health, including access to proper health care, including vaccines. It is unacceptable that Israeli prison guards and criminal prisoners who occupy the same space as Palestinian prisoners are immunized while Palestinian prisoners are denied their right to be vaccinated.

## 2. Refugees

This pandemic has had a tragic impact on Palestinian refugees in all refugee camps. It has left Palestinian refugees even more vulnerable in overcrowded refugee camps, experiencing a challenging social and economic situation exacerbated by the pandemic. The financial crisis of UNRWA due to the United States' decision to withdraw funding from the Agency was already taking its toll on the refugee situation. This has jeopardized essential services, including healthcare services, which Palestinian refugees greatly depend on, especially during the pandemic.

All Palestine refugees in all refugee camps must be able to obtain vaccines against COVID-19 immediately. This is mainly an obligation of the occupying power, yet, it is also a collective responsibility of the international community.

Furthermore, the international community must assist UNRWA in passing this financial crisis to continue to perform its vital work towards Palestinian refugees. A just solution based on international law is reached.

## 3. Gaza

First and foremost, a Palestinian demand that Israel, the occupying Power, immediately lift its blockade on Gaza. Due to the occupation and now a 13-year-old blockade, Gaza's healthcare system is severely compromised. Gaza urgently needs special training of medical staff along with essential medical equipment, medicine, electricity, clean water, and much more to combat this pandemic.

The Committee on Economic Social and Cultural Rights, in its Concluding Observations in 2019, stated that Israel, the occupying Power, should "*Facilitate the entry of essential equipment and supplies and the movement of medical professionals from and to Gaza.*"

Thus, it is the international community's responsibility to pressure Israel to lift the illegal blockade and allow access to all urgent aid, including vaccines and its required infrastructure, into Gaza.

#### **4. East Jerusalem**

Following its occupation, East Jerusalem was officially annexed in the year 1980. Since then, the occupying Power through, *inter alia*, its settler-colonial project in and around the city, the annexation wall, and the permit system, has effectively isolated East Jerusalem from the rest of the territory of the State of Palestine. As a result, Palestinian institutions in East Jerusalem, including hospitals, have been suffering.

During the COVID-19 pandemic, the policies of the occupying Power towards Palestinian hospitals in occupied East Jerusalem had left them de-developed and in need of financial and other forms of aid to survive this pandemic. Furthermore, this period has highlighted discriminatory Israeli practices towards Palestinian citizens in the city. This is seen through harassment and arrests of local volunteers distributing foodstuffs and needed material to families at the beginning of the pandemic outbreak, and the closure of local initiatives to contain COVID-19 and raise awareness about the virus in the community. It should be noted that Israel has also failed to provide numbers and infection rates among the Palestinian population in East Jerusalem, as well as guidance information to Palestinians in East Jerusalem in Arabic.

While the WHO was issuing health recommendations of social distancing and as much as possible staying at home, the Israeli occupation in East Jerusalem left people with no homes. In the year 2020, UNOCHA reported that Israel's occupying forces demolished 145 structures, including two donor-funded structures in East Jerusalem, thereby displacing 361 people, including women and children. Seven days since the start of the New Year (2021), UNOCHA has reported the demolition of 22 structures, including four donor-funded structures, in East Jerusalem, displacing 30 people, including women and children, who find themselves homeless while the occupying Power has taken measures of lockdown in the city.

## **Conclusion**

The State of Palestine has an obligation to provide vaccines as best of its capabilities to its citizens; nonetheless, the State of Palestine remains under prolonged Israeli military occupation. Therefore the international community must hold Israel to account and urge Israel as an occupying Power to fulfill its obligations under international law and make vaccines available to the protected population as a whole and without discrimination. This includes Palestinians in the whole territory of the State of Palestine, which comprise the West Bank, including East Jerusalem, and the Gaza Strip, including Palestinians in occupation prisons and Palestinian Refugees. Despite numerous calls for the

immediate release of Palestinian prisoners, particularly women, children, sick and administrative detainees, and in light of Israel's documented policy of medical negligence, it is crucial that the international community place pressure on Israel and ask for their immediate release.

---

[1] ICRC, Commentary on the IV Geneva Convention Relative to the Protection of Civilian Persons In Time of War, P.314.

[2] Fourth Geneva Convention, Article 59 "If the whole or part of the population of an occupied territory is inadequately supplied, the Occupying Power shall agree to relief schemes on behalf of the said population, and shall facilitate them by all the means at its disposal."

[3] Legal Consequences of the Construction of a Wall in the Occupied Palestinian Territory, Advisory Opinion, I. C. J. Reports 2004, p. 136, paragraph 112.

[4] ICESCR, General Comment No.14, para 44, available at:  
<https://www.refworld.org/pdfid/4538838d0.pdf>

[5] Id. at para. 34.

[6] Id. at para. 40. A full explanation as provided in the General Comment is as follows: "States parties have a joint and individual responsibility, in accordance with the Charter of the United Nations and relevant resolutions of the United Nations General Assembly and of the World Health Assembly, to cooperate in providing disaster relief and humanitarian assistance in times of emergency, including assistance to refugees and internally displaced persons. Each State should contribute to this task to the maximum of its capacities. Priority in the provision of international medical aid, distribution and management of resources, such as safe and potable water, food and medical supplies, and financial aid should be given to the most vulnerable or marginalized groups of the population. Moreover, given that some diseases are easily transmissible beyond the frontiers of a State, the international community has a collective responsibility to address this problem. The economically developed States parties have a special responsibility and interest to assist the poorer developing States in this regard."

# Exhibit 277





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State of Palestine ✓  
@Palestine\_UN

EXHIBIT

0016

Nadia Ghannam

07/23/2021

...

On this [#ValentinesDay](#) delve into stories of heroism and [#love](#) as you follow a series of anonymous portraits that capture the reality of [#Palestinian](#) families affected by the Israeli Citizenship Law. Produced for [@AdalahEnglish](#) (see project below) [@UN](#) [#Palestine](#) [#Jerusalem](#) [#Gaza](#)



Adalah @AdalahEnglish · Feb 14

[#ValentinesDay](#): "My husband received a permit to enter Israel only once, on our wedding day, only until 10 PM. Israeli law tries to make Palestinians feel we aren't human."

~ Leem, from "Families Interrupted" photo project  
[facebook.com/AdalahEnglish/...](https://facebook.com/AdalahEnglish/)



9:19 AM · Feb 14, 2021 · Twitter Web App

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# Exhibit 278



cv-12355-MKV-DCF Document 130-51 F  
State of Palestine @Palestine\_UN · May 11

"I cannot think of any other country on earth that, in full view of nightly TV audiences, has performed such miracles of detailed sadism against an entire society and gotten away with it" (Edward Said). Thank you @MarkRuffalo for seeing the truth for what it is. #Palestine



**Mark Ruffalo**  @MarkRuffalo · May 11

1500 Palestinians face expulsion in #Jerusalem. 200 protesters have been injured. 9 children have been killed. Sanctions on South Africa helped free its black people - it's time for sanctions on Israel to free Palestinians. Join the call. #SheikhJarrah  
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Mark Ruffalo  
@MarkRuffalo

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To US Secretary of State Blinken, and to Foreign Ministers, Parliamentarians and Heads of State worldwide:



The treatment of the Palestinian people has become a stain on the conscience of the world. It is time for the world to stand up and act, to bring sanctions on key Israeli industries until Palestinians are granted full and equal civil rights. We appeal to you for moral leadership and action to save lives.

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3,500,000

3,162,518

3,162,518 have signed. Let's get to 3,500,000

We're on the brink of a full scale war in Israel and Palestine.

**31 Palestinian children have already been killed. Mothers dead. Hundreds injured.**

The tensions are escalating. Fast.  
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It's all right in front of the eyes of the people of Palestine and decades of violence against the people of Palestine. The situation has concluded amounts to "crimes against humanity."

This is where it all began, and this is where it must end.

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Possibly the only way to stop this horrific cycle of Israel's violent displacement of Palestinians from their homes, daily punishment of innocent families, Hamas firing rockets, and Israel bombing Gaza is to **make the economic cost of this conflict too high to bear**.

**It's what helped end apartheid in South Africa, and it can end apartheid here.**

We've just hit 2 million signatures. Click to sign our call to sanction Israel for breaking international law and committing crimes against humanity, and let's make this a turning point.

Posted: 10 May 2021

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# Exhibit 279



**State of Palestine** @Palestine\_UN · May 15

Honest Question: How @POTUS can you explain this? Your "unwavering support for Israel's security & for Israel's legitimate right to defend itself & ppl". How is blowing up @AP & @AJArabic offices defined as a form of "defense"? @StateDeptSpox #Gaza\_Under\_Attack #SaveSheikhJarrah



**Nabih** @nabihbulos · May 15

#Israel bombs tower with @AP and @AJArabic offices in #Gaza.

**EXHIBIT**  
0018  
Nadia Ghannam  
07/23/2021



44

362

541



# Exhibit 280



State of Palestine @Palestine\_UN · May 16

#LISTEN: First hand account of a son and mother stuck under the rubble of their shelled home - struck by the occupying Power's lethal arsenal.

#GazaUnderAttack @ICC #WarCrimes @AliVelshi @AymanM @MarkRuffalo @SusanSarandon @SenSanders @RepRashida @IlhanMN @RepAOC @Palestine\_UN

EXHIBIT

0019  
Nadia Ghannam  
07/23/2021



Farah Baker @Farah\_Gazan · May 16

Stuck with his mom under the rubble of their shelled house, and begging her not to die and leave him #GazaUnderAttack



13



70



110

